September 12, 2011

VIA ELECTRONIC AND U.S. MAIL

Ms. Carmen Santos
Waste Management Division
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Response to Conditional Requirements in First Amendment Polychlorinated Biphenyls, Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan"
Former Sunkist Citrus Processing Plant
616 E. Sunkist Street
Ontario, California

Dear Ms. Santos:

Bowyer Environmental Consulting, Inc. (BEC) has prepared this response to the United States Environmental Protection Agency (EPA) First Amendment to the conditional approval of the polychlorinated biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – "Remedial Action Plan" (First Amendment Conditional Approval), which was provided by the EPA on September 6, 2011. The First Amendment Conditional Approval was provided in response to:

- Previous response (BEC, August 31, 2011) to the Conditional approval of the Remedial Action Plan (BEC, May 22, 2011), and Risk Assessment/RAP Review and Additional Action Items (BEC, July 22, 2011); and

- Porous Media Sampling and Removal Action Plan – Waste Water Treatment Plant (BEC, September 2, 2011).

The facility which is the subject of theses document and approvals is the former Sunkist Citrus Processing Plant (Sunkist Site), located at 616 E. Sunkist Street in Ontario, California.

In order to document all of the communications related to conditions which are still being finalized, the original condition (EPA, August 19, 2011), initial response (BEC, August 31, 2011), and additional condition (EPA, September 6, 2011) are listed, along with the associated responses, as follows.

3. ***Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples.*** *Within 5 days after the date of this approval, Sunkist/BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant...). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist/BEC conduct the following steps:*

    a. *Sunkist/BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.*

    b. *For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist/BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory*

threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.

c. *Sunkist/BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist/BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).*

Sunkist/BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

Please note that, per the specified response schedule (" within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Sunkist/BEC is in agreement with this comment and is providing the additional information and plans as part of this response. Please note that following the additional sampling of the crushed concrete stockpiles per the previously submitted plan (BEC, July 22, 2011), Sunkist made a decision to remove select stockpiles from the Site that we believed would not meet the revised cleanup criteria. The removed crushed concrete stockpiles included, Stockpiles 10, 14, 15, 16, 17 and W-N. In addition, the crushed concrete in Basement 21 is in the process of being removed from the Site. All of this material is being properly disposed of off-Site. Documentation regarding the disposed volumes and disposal facility information will be provided in the Completion Report. The approximate former location of these stockpiles, and of the remaining stockpiles and filled basements are shown on the attached Figure 1.

As per the requirements specified above, BEC performed additional statistical evaluations for the remaining twelve stockpiles of crushed concrete (Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, D and W-S) and two filled basements (Basement 11 and 64). This evaluation was performed per the methods specified in SW-846 (utilizing the 4.5 mg/kg cleanup value as the regulatory threshold, and the specific data previously collected from each stockpile and/or basement) to determine the appropriate number of additional samples necessary to complete the characterization of each of the stockpiles and/or basements. The evaluation is provided in Attachment A. As shown, the re-evaluation of the stockpiles specific data utilizing 4.5 mg/kg as the regulatory threshold found that sufficient data was available to characterize each of the stockpiles/basements except for Stockpile D. The SW-846 evaluation determined that thousands of samples would need to be collected from Stockpiles D in order to complete the characterization. In addition, based on the current dataset, the ProUCL calculation for Stockpile D is 6.35 mg/kg. Given these conditions, it has been decided that Stockpile D will be disposed of off-Site. Documentation regarding the final deposition of Stockpile D will be provided in the Completion Report.

An evaluation of the UCL for Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, and W-S, and for Basement 11 and 64 has been conducted, as provided in Attachment A. As shown the ProUCL estimate for each of these stockpiles and basements is less than the approved 4.5 mg/kg cleanup value. Based on the additional evaluations conducted here, Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B , C and W-S will be utilized to fill low spots and as road base on the Site.

Additional EPA Comment 1: Condition C.3 (Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples). *As indicated in our September 2, 2011 electronic mail (e-mail) message the statistical analysis of the concrete stockpile data presented in your letter satisfies the requirements in Condition 3. In addition, we agree that Stockpile D must be disposed of offsite. Please provide the name of the disposal site to where the entire contents of Stockpile D will be disposed of.*

Stockpile D was transported and disposed of as remediation waste with less than 50 milligrams per kilogram (mg/kg) of PCBs at the Simi Valley Waste Management landfill in Simi Valley, California.

4. ***Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements.*** *USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61 (a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.*

    a) *Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist/BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist/BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist/BEC shall resubmit Figure 10 depicting the soil sampling locations in the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.*

As per our discussion on August 24, 2011, it was agreed that despite the fact that the presence of the crushed concrete in Basement 21 met the regulatory description provided in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C), the data generated by collecting composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i) would be more practical in this case. As a result, it is our understanding that the approach presented in the RAP is to be approved, and there is no need to provide a revised version of Figure 10.

Additional EPA Comment 2: Condition C.4 (Basement 21 Removal Action [Section 4.2.1 of the RAP] and similar removal actions at

other former Sunkist building basements). *USEPA has reconsidered Condition C.4. In reference to sampling of soils in Basement 21, USEPA hereby modifies Condition C.4 by approving the approach proposed by Sunkist/BEC in the Application which is illustrated in Figure 10. Sunkist/BEC do not need to submit a revised Figure 10.*

Agreed and Noted.

5. ***Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP).*** *Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.*

Agreed and Noted. The stockpiles generated through the demolition of Buildings 12 and 15 will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site.

Additional EPA Comment 3: Condition C.5 (Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). *Condition C.5 applies to existing concrete stockpiles and to stockpiles that may be generated as a result of removing from inside building basements crushed concrete that is already located inside the basements. Condition C.5 does not approve or facilitate generation of new concrete stockpiles except those stockpiles that may be generated due to the reasons explained above. If Buildings 12 and 15 have not been demolished yet, proper characterization of the concrete floors shall be conducted prior to demolition of those buildings to ensure that concrete to be crushed does not exceed the 4.5 mg/kg approved PCB cleanup level. Sunkist/BEC shall propose the sampling approach for concrete characterization before demolition of buildings and other concrete structures to be crushed.*

Other than the concrete associated with Buildings 12, 15 and 31 and the Wastewater Treatment Plant (WWTP), the other known concrete and other

porous media in place is present along the eastern, southern and northern margins of the Site, in one east-west roadway structure, and as a slab that formerly underlay Stockpiles W-N and W-S. The areas of known remaining subsurface concrete and other porous media (primarily asphalt) are shown on Figure 1. The in situ sampling plan for these areas is described as follows.

Sampling will be performed consistent with the Region 1 Standard Operation Procedures for Sampling of Porous Media which recommends:

- **Sampling of stained areas (at least 3 samples of each porous material present in each area); and**
- **Where PCBs equipment was used or where PCBs were stored, sample at a frequency of 1 sample every 100 square feet (ft^2).**

In addition, areas that do not exhibit the above-referenced conditions will be sampled on a systematic basis at an interval of no less than 1 sample for every 1,000 ft^2.

If any areas exhibit impacts at levels that exceed the approved PCB cleanup level (4.5 mg/kg) these areas will be cut out, separated and properly disposed of off Site. The remaining non-impacted porous material will be crushed and reused at the Site. Crushing and all other construction-related activities will be subject to the dust monitoring and management procedures as discussed in the proceeding sections.

6. ***Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP).*** *USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.*

The additional sample will be collected at L-42. However, as the City (property buyer) does not want this concrete feature to remain at the current depth, the basement floor at Building 31 will be removed during demolition. As it is no longer planned to leave the basement in place, the sampling approach proposed in the RAP is no longer applicable. It is now planned that this concrete will be removed and crushed along with the rest of Building 31. The stockpiles generated through the demolition of Buildings 31 (including the basement) will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site. It should be noted that the only material that will be utilized for fill and/or road base will be analyzed by the above-described approved methods involving the comparison of the UCL to the cleanup criteria. Material that does not exhibit an UCL of less than 4.5 mg/kg will not be utilized (at Basement 31 or anywhere else on the Site) as fill, or for any other purpose. As a result, only Basement 21, or soil under former stockpiles that exhibited PCB concentrations of greater than 4.5 mg/kg (See Comment No. 7), will need to be sampled to confirm that the unacceptable material has been removed. As such, no additional sampling of the subsurface after the removal of the concrete floor from Basement 31 is necessary (other than at the lifts).

Any additional concrete at the Site generated during the additional demolition will be evaluated by the approved procedures to determine if it can be reused as fill and/or road base, or needs to be disposed off-Site (UCL of greater than 4.5 mg/kg). For instance, the foundation of the Wastewater Treatment Plant (WWTP) has been sampled as presented in the Porous Media Sampling and Removal Action Plan - Wastewater Treatment Plant (BEC, August 29, 2011). As described in this document, areas that exhibited PCB concentrations of greater than 4.5 mg/kg are to be cut out and properly disposed of off-Site. The remaining foundation material will be crushed, and an appropriate number of random samples (per SW-846) will be collected and statistically evaluated to determine

the UCL. If the UCL for this material is less than the cleanup criteria (4.5 mg/kg) than the material will be reused at the Site a fill and/or road base. If the material has an UCL of greater than 4.5 mg/kg it will be properly disposed of off-Site.

Additional EPA Comment 4: Condition C.6 (Basement 31 Porous Material Sampling [Section 4.2.3 of the RAP]). *The City of Ontario no longer wants to keep the Building 31 basement. Sunkist/BEC has proposed to remove the concrete floor from the basement in Building 31 and to crush the floor with the rest of Building 31. A Building 31 concrete stockpile would be created. Sunkist/BEC proposes not to sample the concrete floor before demolition and is requesting that USEPA modify Condition C.6. USEPA is not modifying Condition C.6. The requirements in Condition C.6 remain unchanged and shall be implemented as established in USEPA's August 19, 2011 conditional approval letter. In addition refer to Condition C.5 in Item 3 above. The TSCA regulations require in-situ sampling.*

Agreed and Noted.

7. ***Soil beneath concrete stockpiles.*** *Sunkist/BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist/BEC shall submit for review and approval the sampling approach to make this verification.*

Agreed and Noted. This requirement applies to stockpiles that contained PCB concentrations of greater than 4.5 mg/kg. As such, soil samples will be collected at 0-3 inches below ground surface under and near Stockpiles W-N, W-S, A, C, D, 10, 13, 14, 15, 16, 17 and 18. Samples will not be collected from Stockpiles B, 11, 12, 19, 20 and 21 as discrete samples of greater than 4.5 mg/kg were not observed in these stockpiles. The sampling areas with respect to the Stockpiles, and Site in general, are shown on Figure 1. Specific plans for the sample collection are shown on Figures 2 through 4. As shown, the total area associated with this sampling program is over 1.2 acres in size. As such, the compositing areas have been modified to include up to 36 discrete samples per area for the larger areas. In total, the planned program involves the analysis of 43 composited samples. Each of these samples will be analyzed for

PCBs by the methods specified in Comment No. 11.

Additional EPA Comment 5: Condition C.7 (Soil beneath concrete stockpiles). *No, the requirements in Condition C.7 apply to all concrete stockpiles. Therefore, soils beneath all stockpiles shall be properly characterized for PCBs and sample collection conducted as required in Condition C.7.*

Given the size of the area underlying all of the stockpiles (approximately 1.5 acres) the implementation of sampling by the procedures defined in 40 CFR 761.289(b)(1)(i) and/or 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) would require the collection of over two thousand individual samples that would then be composited into a series of samples for analysis. It would take a two man crew approximately 15 days to implement this type of sampling program. Given the size of the area to be evaluated, BEC is recommending that a discrete sampling program be implemented as an equivalent method. The scope of the discrete sampling program is defined on Figures 2 through 5. As shown, this sampling approach will result in the analysis of 69 discrete soil samples from throughout the entire area under the former crushed concrete stockpiles. The data generated via this approach is equivalent to that that would be generated by the procedures defined in 40 CFR 761.289(b)(1)(i) and/or 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C).

11. ***Extraction and analytical methods.*** *Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA or both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.*

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist/BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

Please note that, per the specified response schedule ("within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Agreed and Noted. As specified in the Sampling and Analysis Plan (SAP) that was submitted (Appendix D) as part of the RAP (BEC, May 22, 2011) the following QA/QC samples will be collected:

- **Field Duplicates - Field duplicate samples will be collected at a minimum frequency of 1 for every 20 samples collected. Duplicate samples will be independently collected as close as possible to the original sample from the same source under identical sampling conditions. The field duplicate samples will be uses to document sampling and analytical precision.**

- **Equipment Rinsate Blanks - Equipment rinseate blanks will be collected to evaluate field sampling and decontamination procedures by pouring water (for soil and stockpile sampling) or hexane (for porous material sampling) over the decontaminated equipment, following sample collection. In general, equipment blanks will be collected at a rate of 1 in 20 (minimum of one per day).**

- **Matrix Spike and Matrix Spike Duplicate (MS/MSD) – In general, for every 20 field samples, one location will have sample volume collected in triplicate and will be designated on the chain-of-custody form as an MS/MSD.**

- **Surrogate Analysis – ABC will analyze surrogates with each of the analyses performed. For the 8082 analysis, the laboratory utilizes 2,4,5,6-tetrachloro-m-xylene and decachlorobihenyl as surrogates. The recoveries of these compounds will be reported on the laboratory reports.**

Additional EPA Comment 6: Condition C.11 (Extraction and analytical methods). *Regarding this issue, one field duplicate sample should be collected every ten (10) samples and not every 20 samples as indicated in the message. Please adjust the number of field duplicate samples.*

Agreed and Noted.

14. ***Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP).*** *Sunkist/BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist/BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.*

Please note that, this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. The non-PCB areas were relatively small and all but one of these areas (24C) had one or two previous samples collected and analyzed for PCBs. The results of the previous analyses, along with plans for additional sample collection and analysis are provided on the attached Figures 5 through 9. Please concur or provide comment on these proposed plans as soon as possible, as the proposed sampling has already been implemented in order to meet the critical project schedule.

Additional EPA Comment 7: Condition C.14 (Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). *USEPA and BEC have discussed the sampling proposed at the "non-PCB" areas. USEPA concurs with the sampling proposed by Sunkist/BEC and Sunkist/BEC shall conduct the sampling as described in the attached Figures 1 (Additional PCB Sampling Plan Area B-5-1), 2 (Additional PCB Sampling Plan Area D-1-1), 6 (Additional PCB Sampling Plan Area L-13), and 9 (Additional PCB Sampling Plan Area 24C).*

Agreed and Noted.

The EPA Comments to the Porous Media Sampling and Removal Action Plan – Waste Water Treatment Plant (BEC, September 2, 2011) and BEC's comments are provided in the following.

1. ***Proposed concrete sampling at Waste Water Treatment Plant (WWTP).*** *USEPA concurs with the revised sampling plan for concrete located in the WWTP. Concrete sampling must be conducted prior to demolition in accordance with all applicable conditions in USEPA's August 19, 2011 letter approving the Application and the attached Figure 3 (Planned Additional Sampling Wastewater Treatment Plant). USEPA and BEC discussed and agreed to the additional concrete sampling at the WWTP on September 1 and 2, 2011.*

   Agreed and Noted.

2. ***Proposed soil sampling at WWTP.*** *USEPA is approving the proposed soil sampling beneath the concrete found to be contaminated with PCBs at the WWTP provided that one additional soil sample be collected 10 feet to the west of the soil sample location proposed outside the concrete area to be cut out and disposed of offsite as "non-TSCA" waste. The attached Figure 7 (Soil Sampling Under Impacted Concrete at WWTP) describes additional soil sampling to be conducted beneath concrete based on currently available concrete sampling results. Depending on the results of the additional concrete sampling to be conducted as required in Condition B.1 above, additional soil samples may be required.*

   Agreed and Noted. Please see the attached Figure 6, which shows the location of the additional soil sample.

3. ***Dust monitoring and suppression.*** *USEPA concurs with Sunkist/BEC's calculations that dust in ambient air shall not exceed 12 micrograms per cubic meter (ug/m3) during demolition and remedial activities. Dust suppression must not generate runoff at the Site and if runoff is generated such runoff must be properly contained and the water tested for PCBs. Depending on the PCB concentration, the water may be used for unrestricted use in accordance with 40 CFR 761.79 (b)(1)(iii).*

   Please note that based on the previously submitted Dust Management Plan there are two proposed risk-based dust monitoring trigger levels that are based on the types of potential exposure routes present at the Site. These levels are:

   - **Off-Site Residents – 0.159 milligrams per cubic meter (mg/m^3) at the fence line; and**
   - **On-Site Workers – 12 mg/m^3 anywhere on the Site.**

   As stated in the subject documents fence line dust monitoring will be implemented to evaluate the potential for off-Site receptors (including residential) to be impacted. If at any time fence line monitoring indicates greater than 0.159 mg/m^3 of dust than immediate additional dust suppression procedures will be implemented and/or work will be halted until the dust levels at the fence line are reduced to below 0.159 mg/m^3. The second trigger level is protective of on-Site workers. In order to monitor this condition, breathing zone dust measurements (within the work areas) will be monitored. If at any time breathing zone monitoring indicates greater than 12.0 mg/m^3 of dust than immediate additional dust suppression procedures will be implemented and/or work will be halted until the dust levels at the breathing zone are reduced to below 12 mg/m^3. Documentation regarding the derivation of these risk-based triggers, that demonstrate that these levels are conservative and protective, has been previously provided in the Dust Management Plan. A copy of this document is provided again as Attachment A. As shown, there were never any risk-based calculations that supported a 12 micrograms per cubic meter (ug/m^3) trigger level. The preceding documents did contain a typo which mistakenly stated 12 ug/m^3 as a trigger level. However this was a typo, which should have

stated 12 mg/m^3, as documented and supported in the original and attached Dust Management Plan.

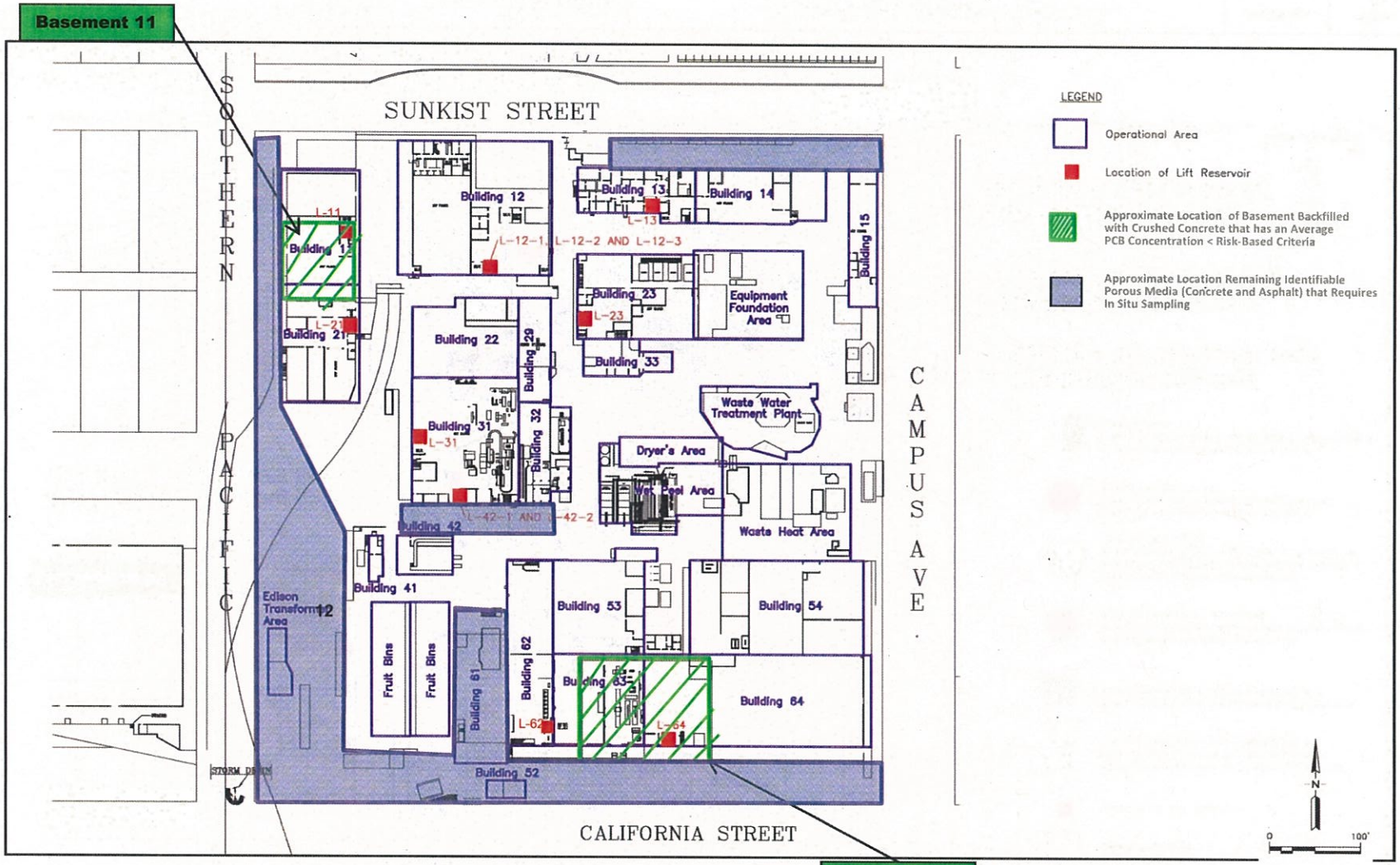
As we have relayed previously, there is a need to meet critical schedule conditions associated with this project. As such, we would appreciate your concurrence to these responses as soon as possible. If there is a need to confer regarding these responses, please contact us at 877-232-4620 at your earliest possible convenience.

Sincerely,

Heriberto Robles, Ph.D., D.A.B.T.
Senior Technical Consultant
Bowyer Environmental Consulting, Inc.

Brett H. Bowyer, P.G.
Principal
Bowyer Environmental Consulting, Inc.

Figures

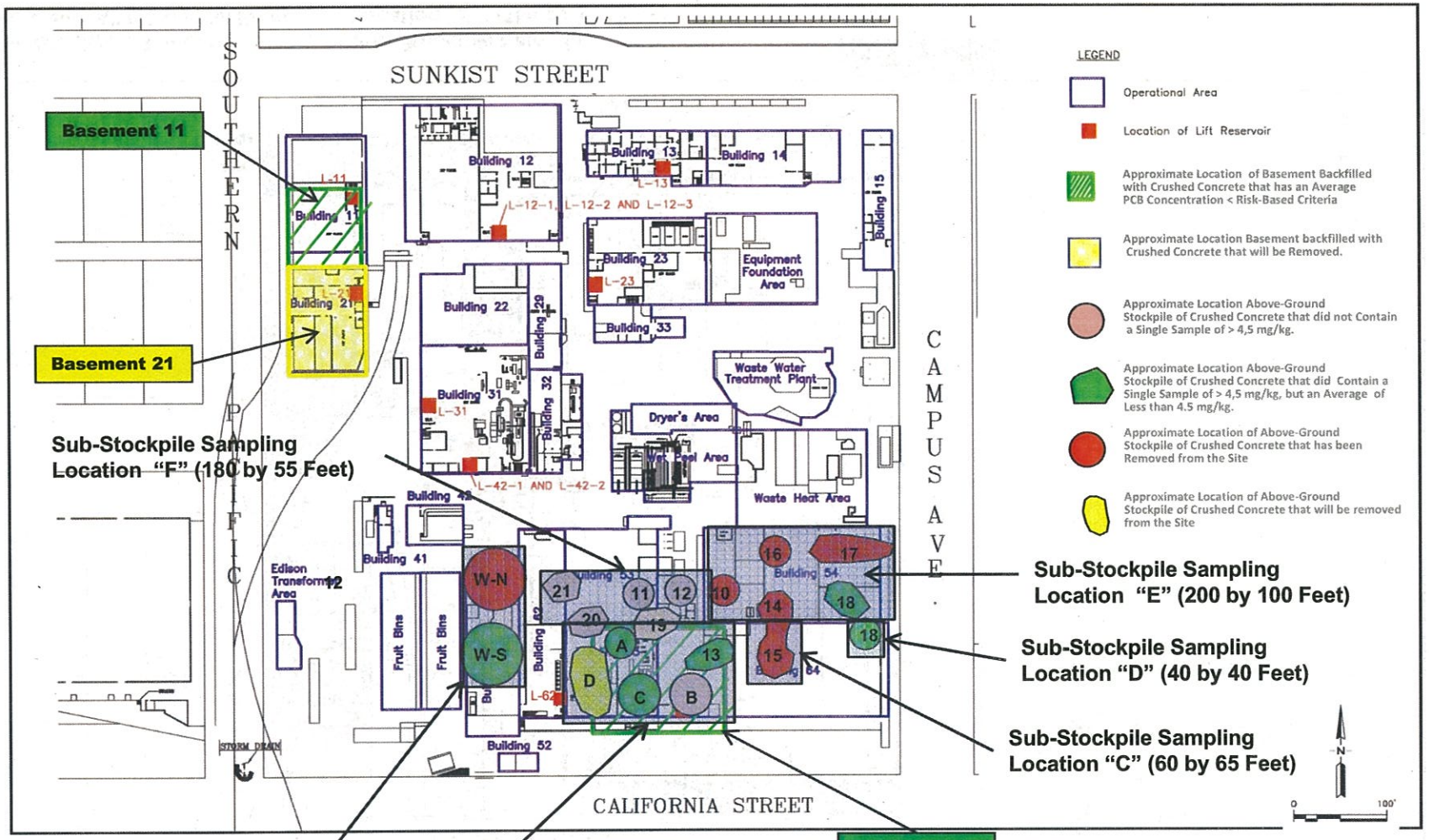


Sub-Stockpile Sampling Location "A" (70 by 150 Feet)

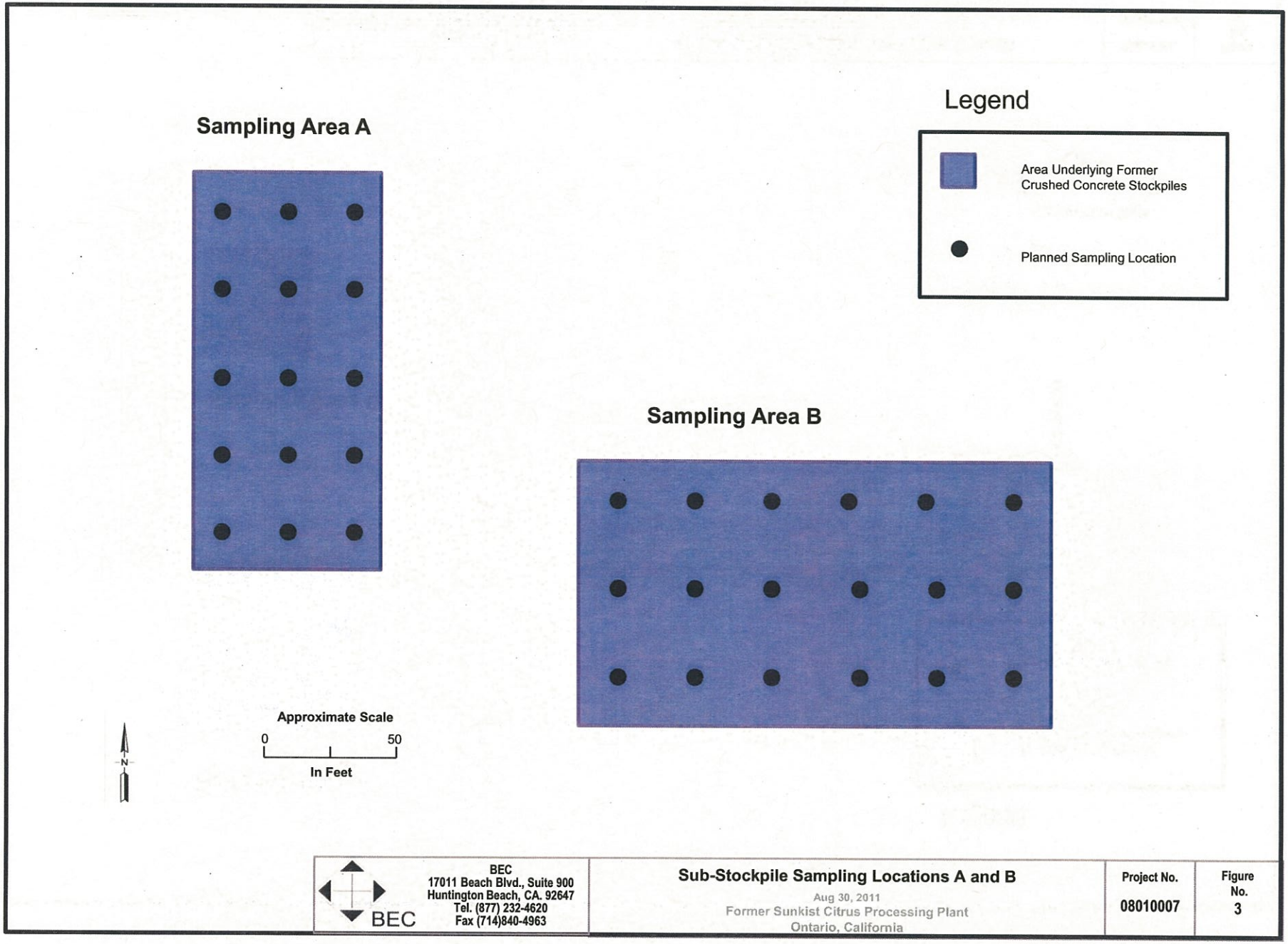
Sub-Stockpile Sampling Location "B " (180 by 100 Feet)

1

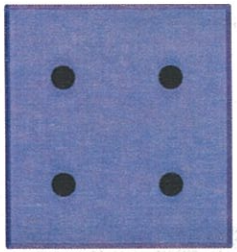
BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963	**In Situ Porous Media To Be Sampled** Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California	Project No. 08010007	Figure No. 1



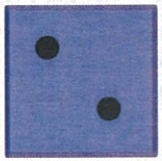
BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963	**Stockpile and Sampling Locations** Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California	Project No. 08010007	Figure No. 2



BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963	**Sub-Stockpile Sampling Locations A and B** Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California	Project No. **08010007**	Figure No. **3**



Sampling Area C



Sampling Area D

Legend

Area Underlying Former Crushed Concrete Stockpiles

Planned Sampling Location

N

Approximate Scale

0 50

In Feet

BEC

BEC
17011 Beach Blvd., Suite 900
Huntington Beach, CA. 92647
Tel. (877) 232-4620
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Sub-Stockpile Sampling Locations C and D

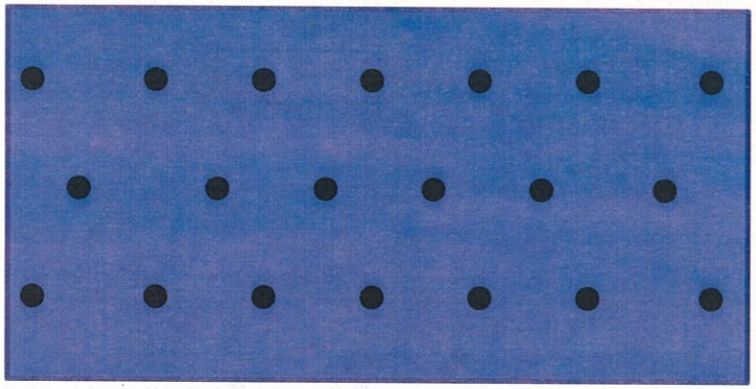
Aug 30, 2011

Former Sunkist Citrus Processing Plant

Ontario, California

Project No.	Figure No.
08010007	4

Sampling Area E

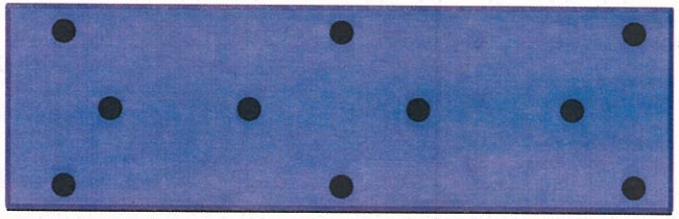


Legend

Area Underlying Former Crushed Concrete Stockpiles

Planned Sampling Location

Sampling Area F



Approximate Scale

0 50

In Feet

N

BEC
17011 Beach Blvd., Suite 900
Huntington Beach, CA. 92647
Tel. (877) 232-4620
Fax (714)840-4963

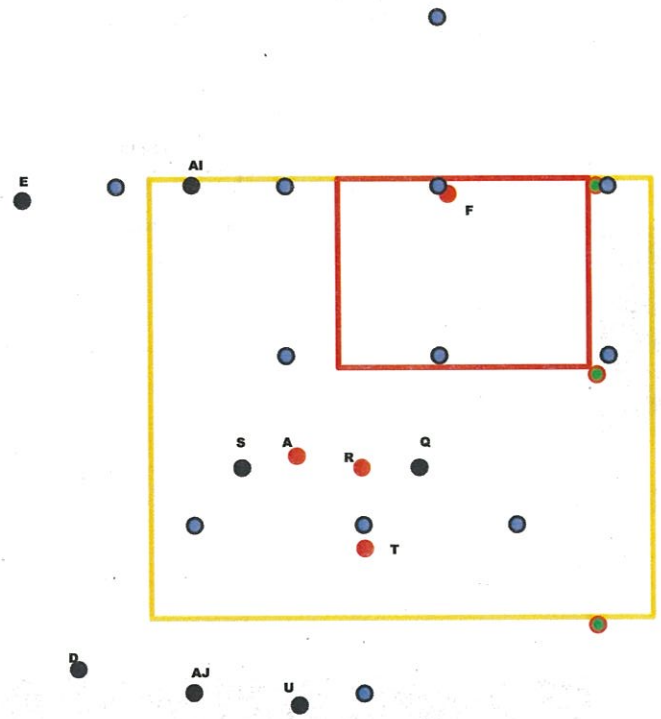
Sub-Stockpile Sampling Location E

Aug 30, 2011

Former Sunkist Citrus Processing Plant

Ontario, California

Project No.	Figure No.
08010007	5



Legend

- Porous Media Sample Location < Risk Based Cleanup Criteria
- Porous Media Sample Location > Risk Based Cleanup Criteria
- Porous Media Planned Additional Sample
- Sub-Slab Soil Sample (0-3") Planned Additional Sample

Approximate Scale

0 10

In Feet

N

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Fax (714)840-4963

Soil Sampling
Under Impacted Concrete at WWTP
Former Sunkist Citrus Processing Plant
Ontario, California

Project No.	Figure No.
09002001	6

Attachment A

Dust Management Plan

Ambient air will be monitored for the presence of dust throughout active demolition and/or grading operations. Activities monitored will include, but not be limited to crushing of concrete, demolition of above and/or below ground structures, movement of materials, and grading.

The dust measurements will be collected during these activities using a Thermo MIE pDR-1000 DataRam. Measurements will be collected downwind, upwind and within working zones. At a minimum, one measurement will be collected every 15 minutes during ongoing operations. Additional dust measurements will also be obtained along the western fence line to evaluate the potential for dust to migrate off-Site to the nearby residential properties.

The following sections describe the method utilized to derive action levels associated with the dust monitoring program and mitigation measures that will be taken to limit the amount of dust generated.

Dust Action Level Calculation for the Protection of Onsite Workers

Aroclor 1254 been detected in crushed concrete and soil at the Site. The NIOSH Recommended Exposure Limit (REL) for Aroclor 1254 is 0.001 milligrams per cubic meter (mg/m^3). The REL is a time-weighted average (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek, above which inhalation is considered by NIOSH to be a concern. Data collected from soil and crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg. By conservatively assuming that all dust generated at the Site has an Aroclor 1254 concentration of 27 milligrams per kilogram (mg/kg), the amount of dust in air required to hold no more than 0.001 mg of Aroclor 1254 has been calculated (37.0 milligrams). As such, the conservative dust action level for the protection of onsite workers has been calculated at 37.0 mg/m^3. As this number is likely to allow for the presence of significant visible dust, an even more conservative action level of 12 mg/m^3 has been established for all work zones at the Site.

Dust Action Level Calculation for the Protection of Offsite Residents

A conservative evaluation of the action level for off-Site dust to residences

was calculated based on the most elevated concentration of PCBs in crushed concrete, and the concentration in air that is protective of residential receptors per the EPA Regional Screening Levels (RSLs) table. According to the RSL table, an Aroclor 1254 concentration in air equal to 4.3E-03 ug/m^3 is protective of residential receptors. Data collected from crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg (please note that the limited area of uncrushed concrete on the WWTP that contained up to 66.6 mg/kg of Aroclor 1260 will not be crushed and it is not likely that a significant amount of dust will be generated during the removal of this material). Assuming all dust generated at the Site had an Aroclor 1254 concentration of 27 mg/kg, the amount of dust in air required to hold no more than 4.3E-03 micrograms of Aroclor 1254 is 0.159 milligrams. Thus, the conservative dust action level for the protection of off-Site residential receptors is 0.159 mg/m^3.

Mitigation Measures

At any time during these monitoring activities bulk dust concentrations in excess of 12 mg/m^3 are measured, work will be halted and additional dust suppression activities will be implemented until the conditions are abated. In addition, if at any time bulk dust concentrations in excess 0.159 mg/m^3 are observed along the western fence line due to on-Site activities, work will be halted and additional dust suppression activities will be implemented. These additional dust suppression activities will involve the application of additional water or dust suppression agent such as SoilTac ^{tm} or Gorilla Snot^{tm}, if necessary.